

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RICHARD P. by and for)	No. 03-390 Erie
RACHEL P. and DENISE L. by)	
and for KRISTINA L.,)	
)	
Plaintiffs,)	
)	
v.)	Jury Trial Demanded
)	
SCHOOL DISTRICT OF THE CITY)	Electronically Filed
OF ERIE, et al.,)	
)	
Defendants.)	

PLAINTIFFS' RESPONSE TO
MOTION FOR ORDER TO QUASH OR MODIFY SUBPOENA

1. Plaintiffs issued a subpoena to Robert Blakely, because Blakely is the custodian of records of the juvenile court delinquency proceedings involving the individuals who assaulted Plaintiffs.

2. The testimony would establish that the assailants admitted to sexual assault and were sentenced as a result of their conduct.

3. This information is relevant to this case.

4. Plaintiffs will agree that any written documents can come in a form in which the last name of the assailants is redacted.

5. Plaintiffs do not oppose the practice of referring to the juveniles by their first name and last initial.

WHEREFORE, Plaintiffs request this Court grant the Motion in part and deny it in part consistent with his response.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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